



## ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear  
Governor

Department for Environmental Protection  
Division of Waste Management  
200 Fair Oaks, 2<sup>nd</sup> Floor  
Frankfort, Kentucky 40601-1190  
[www.kentucky.gov](http://www.kentucky.gov)

Leonard K. Peters  
Secretary

August 13, 2014

Mrs. Jennifer Woodard, Site Lead  
Portsmouth/Paducah Project Site Office  
US Department of Energy  
PO Box 1410  
Paducah, Kentucky 42002

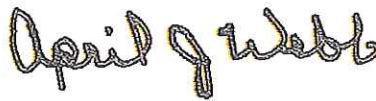
**RE: Approval of the Federal Facility Agreement Milestone Modification for Construction Start for the C-400 Interim Remedial Action Phase IIB Steam Injection Treatability Study (DOE/LX/07-1295&D2/R1).**  
Paducah Gaseous Diffusion Plant  
Paducah, McCracken County, Kentucky  
KY8-890-008-982

Mrs. Woodard:

The Kentucky Division of Waste Management (Division) acknowledges receipt of the DOE's August 8, 2014 Federal Facility Agreement (FFA) Milestone Modification for construction start of the *C-400 Interim Remedial Action Phase IIB Steam Injection Treatability Study*. The On July 21, and July 22, 2014, the Division and the EPA respectively granted conditional concurrence to the *D2/R1 Treatability Study Design, Design Drawings and Technical Specifications Package for the C-400 Interim Remedial Action Phase IIB Steam Injection Treatability Study*. The planned approval date for this document was June 9, 2014. The actual approval date was July 22, 2014, forty-three (43) days later. Due to this delay, and in accordance with Sections XXIX.B.4 and XXIX.B.6 of the FFA, the Division agrees that good cause exists for this Modification, which is hereby granted.

If you have any questions or require additional information, please contact Brian Begley at (502) 564-6716, or e-mail at [brian.begley@ky.gov](mailto:brian.begley@ky.gov).

Sincerely,



April J. Webb, P.E., Manager  
Hazardous Waste Branch

AJW:tm:gb:lww

ec: Jennifer Tufts, US EPA - Region 4, [Tufts.Jennifer@epa.gov](mailto:Tufts.Jennifer@epa.gov)  
Jon Richards, US EPA – Region 4; [Richards.jon@epa.gov](mailto:Richards.jon@epa.gov)  
William E. Murphie, DOE – Paducah, [William.murphie@lex.doe.gov](mailto:William.murphie@lex.doe.gov)  
William Creech, DOE - Lexington; [William.creech@lex.doe.gov](mailto:William.creech@lex.doe.gov)  
Rich Bonczek, DOE – Lexington, [Rich.Bonczek@lex.doe.gov](mailto:Rich.Bonczek@lex.doe.gov)  
Lisa Santoro, DOE – Paducah; [lisa.santoro@lex.doe.gov](mailto:lisa.santoro@lex.doe.gov)  
Jennifer Woodard, DOE – Paducah, [Jennifer.Woodard@lex.doe.gov](mailto:Jennifer.Woodard@lex.doe.gov)  
Rachel Blumenfeld, DOE – Lexington, [Rachel.Blumenfeld@lex.doe.gov](mailto:Rachel.Blumenfeld@lex.doe.gov)  
Kim Knerr, DOE – Paducah, [kim.knerr@lex.doe.gov](mailto:kim.knerr@lex.doe.gov)  
Mark J. Duff, LATAKY – Kevil; [mark.duff@lataky.com](mailto:mark.duff@lataky.com)  
Myrna Redfield, LATAKY – Kevil, [Myrna.Redfield@lataky.com](mailto:Myrna.Redfield@lataky.com)  
John Wesley Morgan, LATAKY – Kevil, [John.Morgan@lataky.com](mailto:John.Morgan@lataky.com)  
Jana White, LATAKY – Kevil; [jana.white@lataky.com](mailto:jana.white@lataky.com)  
Bruce Ford, LATAKY – Kevil; [bruce.ford@lataky.com](mailto:bruce.ford@lataky.com)  
Jim Erickson, LATAKY – Kevil, [Jim.Erickson@lataky.com](mailto:Jim.Erickson@lataky.com)  
Frazier Johnstone, LATAKY – Kevil, [Edward.Johnstone@lataky.com](mailto:Edward.Johnstone@lataky.com)  
Greg Shaia, LATAKY – Kevil, [Greg.Shaia@lataky.com](mailto:Greg.Shaia@lataky.com)  
John Samples, LATAKY – Kevil, [John.Samples@lataky.com](mailto:John.Samples@lataky.com)  
Darla Bowen, LATAKY – Kevil; [darla.bowen@lataky.com](mailto:darla.bowen@lataky.com)  
Sunny Osborne, LATAKY – Kevil; [sunny.osborne@lataky.com](mailto:sunny.osborne@lataky.com)  
LATAKY – General; [latacorrespondence@lataky.com](mailto:latacorrespondence@lataky.com)  
Tracey Duncan, P2S – Paducah; [tracey.duncan@lex.doe.gov](mailto:tracey.duncan@lex.doe.gov)  
Rebecca Wren, P2S – Paducah, [Rebecca.Wren@lex.doe.gov](mailto:Rebecca.Wren@lex.doe.gov)  
Christa Dailey, P2S – Paducah, [christa.dailey@lex.doe.gov](mailto:christa.dailey@lex.doe.gov)  
Bethany Jones, P2S – Paducah; [Bethany.jones@lex.doe.gov](mailto:Bethany.jones@lex.doe.gov)  
Jim Ethridge, CAB – Paducah; [jim@pgdpcab.org](mailto:jim@pgdpcab.org)  
Matt McKinley, CHFS – Frankfort, [matthewW.mckinley@ky.gov](mailto:matthewW.mckinley@ky.gov)  
Stephanie Brock, CHFS – Frankfort, [StephanieC.Brock@ky.gov](mailto:StephanieC.Brock@ky.gov)  
Nathan Garner, CHFS – Frankfort; [Nathan.garner@ky.gov](mailto:Nathan.garner@ky.gov)  
Todd Mullins, KDWM – Frankfort; [Todd.Mullins@ky.gov](mailto:Todd.Mullins@ky.gov)  
Gaye Brewer, KDWM – Paducah, [gaye.brewer@ky.gov](mailto:gaye.brewer@ky.gov)  
Mike Guffey, KDWM-Frankfort, [mike.guffey@ky.gov](mailto:mike.guffey@ky.gov)  
Leo W. Williamson, KDWM – Frankfort, [Leo.Williamson@ky.gov](mailto:Leo.Williamson@ky.gov)

Mrs. Jennifer Woodard

Page 3 of 3

August 13, 2014

DWM File: #750-V; Graybar AIN20140003 (C-400 Phase IIB Steam Injection  
Treatability Study)

DWM File: #505-B; Graybar: AIN20140002 (2014 SMP FFA Mods)

Attachment: Signed FFA Milestone Modification Form



**MODIFICATION TO THE PADUCAH FEDERAL FACILITY AGREEMENT  
ACCORDING TO THE TERMS OF SECTION XXXIX**

<b>Modification requested by:</b> Jennifer Woodard	<b>Date:</b> August 8, 2014
<b>Requester's Organization:</b> U.S. Department of Energy	
<b>Section to be modified:</b> Appendices C and G	
<b>Reason for modification:</b> To modify upcoming C-400 Phase IIb Treatability Study Federal Facility Agreement (FFA) milestones to allow for the extension of the Treatability Study Construction Start from September 29, 2014, to November 11, 2014. On June 18, 2014, and June 19, 2014, the U.S. Department of Energy (DOE) received conditional concurrence on the <i>Treatability Study Design, Design Drawings and Technical Specifications Package for the C-400 Interim Remedial Action Phase IIb Steam Injection Treatability Study at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky</i> , DOE/LX/07-1295&D2, (Treatability Study Design) from the U.S. Environmental Protection Agency (EPA) and the Kentucky Department for Environmental Protection (KDEP), respectively. Based upon this conditional concurrence, DOE submitted a D2/R1 Treatability Study Design to EPA and KDEP for approval on July 18, 2014. DOE received approval of the D2/R1 Treatability Study Design from KDEP and EPA on July 21, 2014, and July 22, 2014.  As previously discussed and agreed to by the FFA parties, the construction start date of September 29, 2014, assumed approval of a D2 Treatability Study Design on June 9, 2014. Because approval of the D2 Treatability Study Design did not occur by that date, and a D2/R1 Treatability Study Design was necessary to address EPA and KDEP conditions, the current construction start date of September 29, 2014, needs to be extended. Approval of the Treatability Study Design was July 22, 2014, which is 43 days later than the June 9, 2014, planned approval date. As a result, an extension is necessary to realign the construction start date with the approval of the D2/R1 Treatability Study Design. The construction start date would be extended by 43 days from September 29, 2014, to November 11, 2014. In accordance with Sections XXIX.B.4 and XXIX.B.6 of the FFA, good cause exists for the milestone extension of the C-400 Phase IIb Treatability Study Construction Start.	
<b>Modification requested:</b>	
<b>Project</b> C-400-Phase IIb Treatability Study	<b>Deliverable</b> D1 Treatability Study Field Start
<b>Current FFA Date<sup>1</sup></b> 9/29/2014	<b>Proposed Date</b> 11/11/2014
<b>Notes:</b> <sup>1</sup> The current FFA dates are based on the milestone modification for the C-400 Phase IIb Treatability Study milestone modification dated March 10, 2014.	

Determination by any one of the three project managers that a modification is major will require that the modification be submitted for public participation to the extent required by DOE's Community Relations Plan under Section XXXIII.

	YES	NO	
DOE, Paducah Site Manager's Approval: 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Date: 
KDEP, Division of Waste Management Director's Approval: 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Date: 
EPA, Region 4, Remedial Project Manager's Approval:	<input type="checkbox"/>	<input type="checkbox"/>	Date:

Note: Return to DOE after signature for the Administrative Record and to initiate distribution to FFA "Controlled" copies.